

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**BERNADINE T. GRIFFITH**

**Plaintiff,**

**v.**

**ONEBEACON INSURANCE COMPANY,  
ONEBEACON AMERICA INSURANCE  
COMPANY, MICHAEL A. SISTO, and  
KAREN ALLEN HOLMES**

**Defendants.**

**C.A. No. 03-CV-12573-EFH**

**DEFENDANTS' MOTION TO EXTEND  
TIME FOR FILING OF SUMMARY  
JUDGMENT MOTION BY THREE DAYS**

NOW COME Defendants OneBeacon Insurance Company, OneBeacon America Insurance Company, Michael A. Sisto, and Karen Allen Holmes (collectively, "Defendants") who respectfully request a three business day extension of the time for the filing of their Motion for Summary Judgment, extending the date for filing from Friday, July 15, 2005 to Wednesday, July 20, 2005.

As grounds for their motion, Defendants state that Plaintiff Bernadine T. Griffith's ("Griffith" or "Plaintiff") eleven count, thirty-seven page Amended Complaint is extremely fact intensive and spans more than ten years. Moreover, the Amended Complaint contains eleven counts and incorporates two Charges of Discrimination filed with the Massachusetts Commission of Discrimination and the Equal Employment Opportunity Commission. The complexity of the allegations in Plaintiff's Amended Complaint coupled with unanticipated interruptions in counsel for Defendants' schedule has resulted in the need to extend the filing deadline by three business days.

The undersigned requested in writing that counsel for Plaintiff state her position on the instant motion so that Defendants could apprise the Court of it in this filing, but counsel for Plaintiff has not responded.

WHEREFORE, Defendants respectfully request this Court extend the time for the filing of Defendants' Motion for Summary Judgment by three business days, extending the date of production from Friday, July 15, 2005 to Wednesday, July 20, 2005.

Respectfully submitted,

ONEBEACON INSURANCE CO.,  
ONEBEACON AMERICA INSURANCE CO.,  
MICHAEL A. SISTO, and  
KAREN ALLEN HOLMES

By their attorneys

/s/ Leah M. Moore  
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Dated: July 11, 2005

**CERTIFICATE OF SERVICE**

I, Leah M. Moore, hereby certify that on July 11, 2005, I caused a true and correct copy of the foregoing to be served via first class mail upon Kathleen J. Hill, Esq., Attorney for Plaintiff, Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, Massachusetts 02109, being the address designated by said attorney for service of all pleadings.

/s/ Leah M. Moore  
Leah M. Moore